

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

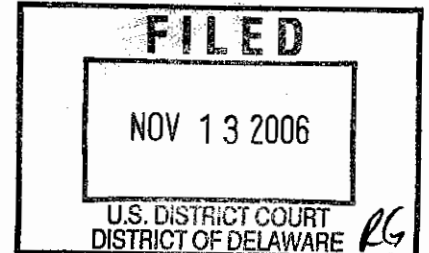
UNITED STATES OF AMERICA

VS.

RONALD LONG

NO. 06-78-GMS

MOTION TO SUPPRESS
INCRIMINATING STATEMENTS



AND NOW, the defendant, Ronald Long, by and through his attorney, Elliot M. Cohen, Esquire does file the within Motion and avers as follows:

1. The defendant is represented by Elliot M. Cohen, Esquire in the above referenced criminal matter.
2. The defendant is charged with Conspiracy to Defraud a Financial Institution and Bank Fraud in violation of 18 U.S.C. §1344 as well as negotiating counterfeit checks.
3. The defendant was interrogated by agents of the U.S. Postal Inspection Service on January 4, 2006. It is respectfully submitted that his waiver of the right to remain silent and to have counsel present during questioning was the product of unlawfully coercive interrogation techniques.

4. Accordingly, it is respectfully requested that his incriminating confession be suppressed.
5. An evidentiary hearing is respectfully requested.

WHEREFORE, for all of the foregoing reasons, it is respectfully requested that the within motion be **GRANTED**.

Respectfully submitted,

BY: _____

ELLIOT M. COHEN, ESQ.

Attorney for Defendant

Suite 1516

Two Penn Center Plaza

15th & JFK. Blvd.

Phila, PA. 19102

(215) 568-1300

IDENTIFICATION NO. 69869

CERTIFICATE OF SERVICE

Elliot M. Cohen, Esquire being duly sworn according to law , deposes and says that on the **8th day of November, 2006**. A copy, of the within document was served upon the following individuals:

United States District Court
For the District of Delaware
Attention: Clerk's Office
Lockbox 18
844 King Stret
Wilmington, Delaware 19801

Beth Moskow Schnoff, Esquire
U.S. Attorney's Office
1007 Orange St- Suite 706
P.O. Box 2046
Wilmington, Delaware 19899-2046

Honorable Gregory Sleet
United States District Judge
844 King Street
Wilmington, Delaware 19801

Respectfully submitted,

BY: 

ELLIOT M. COHEN, ESQ.
Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA

VS.

RONALD LONG

NO. 06-78-GMS

ORDER

AND NOW, this _____ day of _____, 2006, it is hereby **ORDERED** and **DECREED** that defendant's Motion to Suppress Incriminating Statements is **GRANTED**.

BY THE COURT:

UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

J.